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19	LIMITED STATES	DISTRICT COLURT
20	UNITED STATES DISTRICT COURT	
20	NORTHERN DISTRICT OF CAL	IFORNIA, OAKLAND DIVISION
21	CHACOM DROWN, WHILLIAM DVATT	C N- 4-20 02//4 VCD CVV
22	CHASOM BROWN, WILLIAM BYATT, JEREMY DAVIS, CHRISTOPHER	Case No. 4:20-cv-03664-YGR-SVK
22	CASTILLO, and MONIQUE TRUJILLO,	DECLARATION OF JONATHAN TSE IN
23	individually and on behalf of themselves and	SUPPORT OF GOOGLE'S MOTION TO
24	all others similarly situated,	SEAL PORTIONS OF GOOGLE LLC'S
24	Plaintiffs,	MOTION UPDATING THE COURT ON
25	, , ,	ITS PRESERVATION
	v.	IMPLEMENTATION EFFORTS AND
26	GOOGLE LLC,	SEEKING RELIEF FROM THE JULY 30
27	GOOGLE LEC,	DEADLINE IMPOSED BY THE JULY 15, 2022 PRESERVATION ORDER (DKT. 630)
۷ /	Defendant.	2022 I RESERVATION ORDER (DR 1.030)

TSE DECLARATION ISO GOOGLE'S ADMINISTRATIVE MOTION TO SEAL

Case No. 4:20-cv-03664-YGR-SVK

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I, Jonathan Tse, declare as follows:

Document

I am a member of the bar of the State of California and an attorney at Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC ("Google") in this action. I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.

- 2. I am making this declaration pursuant to Civil Local Rule 79-5(e)-(f) as an attorney for Google as the Designating Party, pursuant to Civil Local Rule 79-5(f)(3) in response to Dkt. 582.
- 3. I have reviewed the documents that Plaintiffs seek to file under seal pursuant to Civil Local Rule 79-5. Based on my review, there is good cause to seal the following information:

Google LLC's Administrative	The information requested to be sealed contains Google's
Motion Updating the Court on its	highly confidential and proprietary information regarding
Preservation Implementation	highly sensitive features of Google's internal systems and
Efforts and Seeking Relief from	operations, including various types of Google's internal
the July 30 Deadline Imposed by	projects, data signals, and logs, and their proprietary
the July 15, 2022 Preservation	functionalities, that Google maintains as confidential in the
Order (Dkt. 630)	ordinary course of its business and is not generally known
0.000 (= 00 0)	to the public or Google's competitors. Such confidential and
Pages 1:16-24, 2:2-7, 2:10-19	proprietary information reveals Google's internal strategies,
	system designs, and business practices for operating and
	maintaining many of its important services, and falls within
	the protected scope of the Protective Order entered in this
	action. See Dkt. 81 at 2-3. Public disclosure of such
	confidential and proprietary information could affect
	Google's competitive standing as competitors may alter
	their systems and practices relating to competing products.
	It may also place Google at an increased risk of
	cybersecurity threats, as third parties may seek to use the
	information to compromise Google's internal practices
	relating to competing products.
Declaration of Benjamin Kornacki	The information requested to be sealed contains Google's
ISO Google LLC's Administrative	highly confidential and proprietary information regarding
Motion	highly sensitive features of Google's internal systems and
	operations, including various types of Google's internal
Pages 1:22, 1:26-27, 2:1-6, 2:8,	projects, data signals, and logs, and their proprietary
2:10-24, 3:6-12, 3:15, 3:17	functionalities, that Google maintains as confidential in the
	ordinary course of its business and is not generally known
	to the public or Google's competitors. Such confidential and
	proprietary information reveals Google's internal strategies,
	system designs, and business practices for operating and

Basis for Sealing

1 2	maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect	
3	Google's competitive standing as competitors may alter	
4	their systems and practices relating to competing products. It may also place Google at an increased risk of	
5 6	cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices	
7	relating to competing products.	
8		
9	These redactions are limited in scope and volume. Because the proposed redactions are narrowly	
10	tailored and limited to portions containing Google's highly-confidential or confidential information,	
11	Google requests that the portions of the aforementioned documents be redacted from any public	
12	version of those documents.	
13	5. Google does not seek to redact or file under seal any of the remaining portions of	
14	Google LLC's Administrative Motion Updating the Court on its Preservation Implementation	
15	Efforts and Seeking Relief from the July 30 Deadline Imposed by the July 15, 2022 Preservation	
16	Order (Dkt. 630) not indicated in the table above.	
17	I declare under penalty of perjury of the laws of the United States that the foregoing is true	
18	and correct. Executed in San Francisco, California on July 27, 2022.	
19		
20	DATED: July 27, 2022 QUINN EMANUEL URQUHART & SULLIVAN, LLP	
21		
22	Du m	
23	By <u>/s/ Jonathan Tse</u> Jonathan Tse	
24	Attorney for Defendant	
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